

May 10, 2019

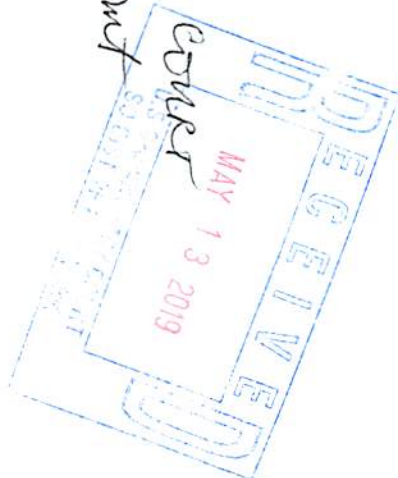
BK clerk of  
SD of NY



Please file in  
Major A Creamer  
# 09-50026

General Motors  
Motus LLC Liquidator

IN UNITED STATES COURT  
SD of NY, BK Court



CREAMER  
✓

# 14MD2543

Impachment Gm, BL White Martin

# 09-50026

2008 President Barack Obama Impachment to 2009  
Gm Bankruptcy July 2009 in 302nd pt # 09-50026  
and response Motion of 2019, Interrogatories Producer

2011  
ICS  
Defendant Gm to Gm for trial of accusers

2009 of 2006 defendant Cobalt  
and Defendant of 2011 Court

2014 2543 Gm refused to answer Plaintiff  
in 2011 Court May 12 Clerk, Victim

SDNY TRANSCRIPT  
and submit 1st set of Interrogatories  
Bankruptcy 2012 Judge Robert  
Carter

for sent 2019 year pages 8  
May 2

Gm Impachment  
Bankruptcy 2008  
1st set of Production  
May 2 pages 8

Vanessa Barsanti  
Kirkland & Ellis LLP  
300 N. LaSalle  
Chicago, IL 60654  
Phone: 312-862-2000  
Fax: 312-862-2200  
[vanessa.barsanti@kirkland.com](mailto:vanessa.barsanti@kirkland.com)

*Attorney for Defendant  
General Motors LLC*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

14-MD-2543 (JMF)

IN RE: GENERAL MOTORS, LLC IGNITION  
SWITCH LITIGATION

THIS DOCUMENT RELATES  
TO: MARJORIE CREAMER

**DEFENDANT GENERAL MOTORS LLC'S FIRST SET OF  
INTERROGATORIES TO MARJORIE CREAMER**

Pursuant to Rule 33 of the Federal Rules of Civil Procedure ("FRCP") and the Local Rules of the U.S. District Court for the Southern District of New York, Defendant General Motors LLC ("New GM") requests that Plaintiff answer, in writing and under oath, the following interrogatories, and serve such answers upon counsel for New GM, Kirkland & Ellis LLP, no later than thirty-three (33) days after service of these interrogatories.

**DEFINITIONS**

1. "Subject Vehicle" is defined as the vehicle that serves as the basis for Your claims in this matter.

(1-7)

2. "Subject Incident" is defined as the accident involving the Subject Vehicle that is the basis for Your claims in this matter.

3. "Ignition-Switch Related Event" includes, but is not limited to, an incident during which You allege Your ignition switch moved from the run position to accessory or otherwise moved out of the run position resulting in a partial loss of electrical power, turning off the engine, a loss of power steering and/or caused the airbags not to deploy.

4. The terms "You" and "Your" mean the Person that is alleged to have been injured in the Subject Incident and their agents, servants, representatives, assigns and any other person or persons acting for on their behalf, including their attorneys. If the plaintiff is the legal representative of that individual, You and Your should be interpreted to also refer to the legal representative.

5. "Identify" means state a person's full legal name and current whereabouts, the person's residence address and telephone number, and, in the case of a natural person, his or her business address, business telephone number, job title, and his or her relationship to you.

### INTERROGATORIES

#### INTERROGATORY NO. 1:

State whether you were suffering from physical infirmity, disability, or sickness at the time of the Subject Incident? If so, what was the nature of the infirmity, disability, or sickness?

#### INTERROGATORY NO. 2:

*no tickets issued*  
If you were issued any citations or tickets arising out of the Subject Incident described in the complaint, state the following: (i) the nature of the charge; (ii) what plea or answer, if any, you entered to the charge; (iii) what court or agency heard the charge; (iv) whether any written report was prepared and if you have a copy of the report; and (v) whether the testimony at any

( 2 - 7 )

trial, hearing, or proceeding on the charge was recorded in any manner, and, if so, identify the name and address of the person who recorded the testimony?

**INTERROGATORY NO. 3:**

Identify all Persons (including their addresses and telephone numbers) alleged to have knowledge of, or information concerning, the Subject Incident and state the facts about which the person has knowledge or information.

**INTERROGATORY NO. 4:**

Identify all Persons with whom You communicated about the Subject Incident and the circumstances leading up to the Subject Incident, including but not limited to any family member, friend, police officer, first responder, health care provider, or insurer.

**INTERROGATORY NO. 5:**

Identify every person known to you, your agents, or your attorneys, who has knowledge about, or possession, custody, or control of any model, plat, map, drawing, motion picture, video, or photograph pertaining to any fact or issue relating to the Subject Vehicle or the Subject Incident; and describe as to each, what item such person has, the name and address of the person who took or prepared it, and the date it was taken or prepared.

**INTERROGATORY NO. 6:**

State whether any of the following parts, components, or systems of the Subject Vehicle have ever been repaired, replaced, or modified: air bags, air bag sensors, seatbelts, sensing and diagnostic module, ignition switch, ignition lock cylinder, power steering system, and power braking system. For each repair, replacement, or modification, provide the name and address of the person or entity performing the work, describe the work performed, and the date it was performed.

(3-8)



**INTERROGATORY NO. 7:**

Other than the Subject Incident or damage caused by the Subject Incident, identify all other accidents involving the Subject Vehicle or damage to the Subject Vehicle, describe each accident and each item of damage, and identify all persons having knowledge of the accident or damage.

**INTERROGATORY NO. 8:**

State whether Your current or previous driver's license has ever been suspended or revoked, and describe the circumstances of such suspension or revocation, including the date and the reason.

**INTERROGATORY NO. 9:**

Identify all traffic citations or tickets You have been issued as a driver in the ten (10) year period before the Subject Incident, including the date of each citation, the reason for the citation, and the vehicle You were driving, and explain how the citation or ticket was resolved.

**INTERROGATORY NO. 10:**

Identify all vehicular accidents You have been involved in as a driver in the ten (10) year period before the Subject Incident, including the date of each accident, the make, model and year of the vehicle You were driving, the general circumstances of each accident, who was found to be at fault, if anyone, and any injuries sustained by You or any other Person (including whether hospitalization was required).

**INTERROGATORY NO. 11:**

Identify any internet social media website which you have used or maintained an account, or which has been used or maintained on your behalf, in the last eight (8) years. "Internet social media websites" includes, but is not limited to Facebook, Twitter, LinkedIn, Flickr, Google+, hi5, LiveJournal, MyLife, Classmates.com, Reunion.com, Plaxo, Tagged, XboxLive, Foursquare, Gowalla, Myspace, Windows Live Spaces, CarePages, Snapchat, Instagram or other similar sites.

*accident Sept 24, 2009*  
*10 year ago*  
*(4-8)*

**INTERROGATORY NO. 12:**

*10 years ago*  
If you have any internet social media website account(s), please identify or provide a copy of all non-privileged content/data related to the Subject Incident, the Subject Vehicle, and/or injuries Plaintiff alleges to have sustained in the Subject Incident that were shared on the account(s) since six (6) months before the date of the Subject Incident to the present or, alternatively, please provide your username and password for each account.

**INTERROGATORY NO. 13:**

*Unknown, head injury*  
For any internet social media website accounts identified above, please describe any changes you have made to your privacy or other account settings, and describe any content which you have deleted or erased since the date of the Subject Incident that was related to the Subject Incident, the Subject Vehicle, and/or injuries Plaintiff alleges to have sustained in the Subject Incident.

**INTERROGATORY NO. 14:**

*Sold at auction*  
State where the Subject Vehicle, any removed component parts, the ignition key, and any key chain and key chain accessories are currently located and who has possession of them, and explain the chain of custody since the time of the Subject Incident.

**INTERROGATORY NO. 15:**

*10 years ago*  
*Unknown Contact CLAY CHERNO.*  
*HAYS KS*  
Identify all individuals or businesses that serviced, repaired, or modified the vehicle (before and after the Subject Incident), and, for each, describe the nature of the service, repair, or modification performed and the date(s) on which it was completed.

**INTERROGATORY NO. 16:**

*unknown 10 years ago*  
Describe the clothing and footwear You were wearing when the Subject Incident occurred and describe the complete chain of custody for the clothing and footwear from the accident scene

*(5 - 8)*

to the present location of the clothing and footwear. The term "clothing" includes but is not limited  
to outerwear such as jackets or sweatshirts and accessories such as gloves and hats.

unknown 10 years ago  
CREAMER v. GM  
2006 Cobalt

Dated: May 1, 2019

/s/ Vanessa Barsanti

Vanessa Barsanti

Kirkland & Ellis LLP

300 N. LaSalle Street

Chicago, IL 60654

Phone: 312-862-2000

Fax: 312-862-2200

Email: [vanessa.barsanti@kirkland.com](mailto:vanessa.barsanti@kirkland.com)

*Attorney for Defendant General Motors LLC*

(6 - 8)



VERIFICATION

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the above responses to Defendant General Motors LLC's First Set of Interrogatories to Wave Three Plaintiffs are true and correct.

Date: May 10, 2019  
Name: MARJORIE A CREAMER  
Signature: Mari A Creamer  
2006 Cobalt LT Sedan  
Sport Pkg  
acquired Sept 24, 2009  
# 14MD 2543  
# 16 - 3923  
# 09 50026

(7-8)

**CERTIFICATE OF SERVICE**

I hereby certify that on May 2, 2019, I served the foregoing Request for Production via certified mail on Plaintiff in 1:16-cv-3923 as there is no counsel of record, in addition to Lead Counsel for Plaintiffs via email.

/s/ Vanessa Barsanti

Vanessa Barsanti

May 7, 2019 1st 2019 attempt  
Mae A. Greene  
Certified by Service, US mail  
to  
Clarey Court SD of NY  
Def attorney

(8-8)

Vanessa Barsanti  
Kirkland & Ellis LLP  
300 N. LaSalle  
Chicago, IL 60654  
Phone: 312-862-2000  
Fax: 312-862-2200  
[vanessa.barsanti@kirkland.com](mailto:vanessa.barsanti@kirkland.com)

Attorney for Defendant  
General Motors LLC

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE: GENERAL MOTORS, LLC IGNITION  
SWITCH LITIGATION

THIS DOCUMENT RELATES  
TO: MARJORIE CREAMER

*Obama President  
unpleached for filing  
BK for General Motors  
2009 July*

14 MD-2543 (JMF)

*2011 year  
all sent  
earlier in  
productions*

**DEFENDANT GENERAL MOTORS LLC'S FIRST SET OF REQUESTS  
FOR PRODUCTION TO MARJORIE CREAMER**

Pursuant to Rule 34 of the Federal Rules of Civil Procedure ("FRCP") and the Local Rules of the U.S. District Court for the Southern District of New York, Defendant General Motors LLC ("New GM") requests that Plaintiff respond to the following Requests for Production within the time prescribed by the Federal Rules of Civil Procedure, and produce the following documents and things for inspection and copying at the offices of Kirkland & Ellis LLP, 300 North LaSalle, Chicago, Illinois 60654, or at such other place as may be agreed upon by the parties.

**DEFINITIONS**

1. "Subject Vehicle" is defined as the vehicle that serves as the basis for and gives rise to Your claims in this matter.

2. "Subject Incident" is defined as accident involving the Subject Vehicle that is

*Quality of  
Life and  
Limbs  
Lowered (1-8)  
future Drs.  
owed money  
for ruining  
Colbert*

the basis for and gives rise to Your claims in this matter.

3. "Ignition-Switch Related Event" includes, but is not limited to, an incident during which You allege the ignition switch in the Subject Vehicle moved from the run position to accessory or otherwise moved out of the run position resulting in a partial loss of electrical power, turning off the engine, a loss of power steering and/or caused the airbags not to deploy.

4. The terms "You" and "Your" mean the Person that is alleged to have been injured in the Subject Incident and their agents, servants, representatives, assigns and any other person or persons acting for on their behalf, including their attorneys. If the plaintiff is the legal representative of that individual, You and Your should be interpreted to also refer to the legal representative.

#### **REQUESTS**

1. The Subject Vehicle, including any component parts.
2. The Subject Vehicle ignition key, key ring(s), key fob, key chain or assembly, or any items or accessories on the key chain at the time of the Subject Incident.
3. Any document identified in your answers to any interrogatories served upon you in this matter or in your Plaintiff Fact Sheet.
4. All documents or technical data supporting any allegation made by You that:  
(a) the Subject Vehicle's ignition switch moved out of the run position in connection with the Subject Incident or any other Ignition-Switch Related Event; (b) the Subject Vehicle experienced a "moving stall" or otherwise lost engine power and that this caused a loss of vehicle control during the Subject Incident or any other Ignition-Switch Related Event; (c) a loss of power steering occurred because the Subject Vehicle's ignition switch moved out of the run position during the Subject Incident or any other Ignition-Switch Related Event; (d) a loss

( 2 - 8 )

of power assist brakes occurred because the Subject Vehicle's ignition switch moved out of the  
run position during the Subject Incident or any other Ignition-Switch Related Event; or (e) any  
of the airbag systems in the Subject Vehicle failed to deploy during the Subject Incident or any  
other Ignition-Switch Related Event because the Subject Vehicle's ignition switch moved out  
of the run position.

5. All written and/or recorded statements and communications about the Subject  
Incident or any other Ignition-Switch Related Event given by You to any person or entity.

6. All written and/or recorded statements and communications about the Subject  
Incident given by any witness or third party.

7. If you were driving the Subject Vehicle at the time of the Subject Incident,  
provide a copy of Your itemized mobile telephone bill for the 24-hour period before and after  
the Subject Incident, including a listing of all calls or communications for the mobile telephone  
during that period.

8. All communications sent by or to You during the 24-hour period immediately  
preceding the Subject Incident and the 24-hour period immediately following the Subject  
Incident.

9. All non-privileged communications concerning GM, GM vehicles, this  
litigation, or the Subject Incident sent to You or by You to any expected witness or person with  
knowledge of the Subject Incident.

10. All communications, including but not limited to all e-mails, facsimiles, instant  
messages, text messages, picture messages, social media posts, and/or video messages, sent by  
or to You or on Your behalf concerning the Subject Incident, except for privileged  
communications with Your counsel.

2005 Cobalt  
Ignition switch  
Parts  
Steering  
motor  
Airbag  
Brakes

Shutdown

United States Supreme  
Court Cases

July 6, 2009 President OBAMA  
2011 Default GM

CREAMER #12-5606-14-6350  
✓ ESIS

SD of NY  
US Bankruptcy Court #09-50026-OBAMA

transcript 2012

President's order  
to file BK Chapter 11 reorganization

and not pay any of injuries or death

SD of NY #14 MD 2543

CEO  
parts

GM cars today 1-8) 2019  
Cleaner

11. All communications, including but not limited to e-mails, facsimiles, instant messages, text messages, picture messages, social media posts, and/or video messages, sent by or to You or on Your behalf concerning the Subject Vehicle and involving an alleged vehicle defect, including but not limited to an alleged defect of the vehicle's ignition switch, except those communications to Your counsel.

12. All diaries, calendars, journals, or other writings, drawings, depictions, or blogs kept or made by You or on Your behalf concerning the Subject Vehicle, the Subject Incident, and any alleged vehicle defect, and/or Your alleged injuries or damages.

13. All photographs, films, movies, or video recordings of You taken after the Subject Incident.

14. All photographs, films, movies, or video recordings of the Subject Vehicle.

15. All photographs, films, movies, or video recordings of the Subject Vehicle ignition key, key ring(s), key fob, key chain or assembly, or any items or accessories on the key chain at the time of the Subject Incident.

16. All documents and communications from You or Your counsel or on Your behalf to any individual with relevant knowledge of the Subject Vehicle or Subject Incident.

17. All non-privileged documents and tangible things evidencing or concerning any investigation conducted by You or on Your behalf regarding the Subject Incident.

18. Copies of all writings, drawings, photographs, videos, charts, sketches, diagrams, blueprints, plats, samples, maps, plans, or renderings You or someone on Your behalf made which depict the location or area where the Subject Incident occurred (other than documents created by Your counsel or at Your counsel's request).

19. All documentation, photographs, videos or recordings of any testing or

2011-6M  
Default

HOWARD  
LEROY  
ELLIS  
WW II  
VETERAN  
LW + T  
Property Fraud

U.S. Supreme Court # 12-5833

GM claim and Ellis 12-5606

Bank Motor LLC GM 14-6350

2013  
Howard  
Leroy  
Ellis  
died

(4-8) Cleamer  
padlock on door when my property + counsel  
Washington Attorneys

measurements of the torque or torque resistance of the Subject Vehicle's ignition switch or ignition system.

20. Documents concerning all additions of accessories or modifications to the Subject Vehicle, including documents sufficient to show the Person who performed same, where it was performed and on what date.

21. Documents related to your receipt of a notice of a recall campaign or technical service bulletin, including documents evidencing the date on which you received such communications.

22. Documents concerning all repairs performed on the Subject Vehicle pursuant to a recall campaign or technical service bulletin, including documents sufficient to show the dates same were performed and the dealership where performed.

23. All documents, records, photos, communications, or videos concerning any accidents in which the Subject Vehicle was involved.

24. If you were driving the Subject Vehicle at the time of the Subject Accident, all documents, records, photos, communications, or videos concerning any vehicular accidents in which You have been involved in the past ten (10) years other than the Subject Incident.

25. If you were driving the Subject Vehicle at the time of the Subject Accident, all documents concerning any suspension or revocation of Your current driver's license or any previous driver's license in the past ten (10) years, including documents describing the reason for the suspension or revocation and the date and duration of any suspension or revocation.

26. If you were driving the Subject Vehicle at the time of the Subject Accident, all documents concerning all traffic citations or tickets You have been issued for a moving violation in the past ten (10) years.

(5-8) Cuame



27. All documents concerning any Ignition-Switch-Related Event that You or any other Person claims to have experienced in the Subject Vehicle, whether as a driver or passenger, other than the Subject Incident.

28. If you were driving the Subject Vehicle at the time of the Subject Accident, all pharmacy records for prescriptions You filled in the one year period prior to the Subject Incident.

29. If you were driving the Subject Vehicle at the time of the Subject Accident, all documents concerning any treatment or consultation for any alcohol or chemical dependency condition that You experienced, were diagnosed with, or were treated for during the five (5) years prior to the Subject Incident and/or since the Subject Incident.

30. If you were driving the Subject Vehicle at the time of the Subject Accident, all documents concerning any medications or drugs You took during the 120-hour period prior to the Subject Incident and/or since the Subject Incident.

31. All documents reflecting any appraisals of vehicle damage or estimate of repair work for damage to the Subject Vehicle sustained in the Subject Incident and all records of any repair work done to the Subject Vehicle as a result of the accident.

32. All documents You have received from Persons other than General Motors LLC in this above-entitled cause number that relate to the design, performance, manufacture, testing, inspection, marketing, and/or distribution of any Subject Vehicle component that You claim is defective.

33. All documents related to the sale or disposal, if any, of the Subject Vehicle.

34. All documents related to any repairs or modifications made to the Subject Vehicle before the Subject Incident.

35. All documents relating to the use, repair, modifications, or whereabouts of the

*purchased new 2006 Cobalt*  
*45,000.00*  
*program insured 10,000 only*  
*(6-8) Creamer*

Subject Vehicle after the Subject Incident, including tow records, repair records, auction, salvage or sales records.

36. All documents or other materials sent to or received from any automobile insurer related to the Subject Vehicle or Subject Incident.

37. All documents relating to the road conditions at the time of the Subject Incident.

Dated: May 2, 2019

/s/ Vanessa Barsanti

Vanessa Barsanti

Kirkland & Ellis LLP

300 N. LaSalle Street

Chicago, IL 60654

Phone: 312-862-2000

Fax: 312-862-2200

Email: [vanessa.barsanti@kirkland.com](mailto:vanessa.barsanti@kirkland.com)

*Attorney for Defendant General Motors LLC*

(7 - 8) Cleaner

**CERTIFICATE OF SERVICE**

I hereby certify that on May 2, 2019, I served the foregoing Request for Production via certified mail on Plaintiff in 1:16-cv-3923 as there is no counsel of record, in addition to Lead Counsel for Plaintiffs via email.

/s/ Vanessa Barsanti

Vanessa Barsanti

response 2019  
product  
Myles A. Clemon  
May 10, 2019

Cert of Service  
US mail, fax - email  
Pro Se  
Clerk of SD of NY  
Def attorney

(8-8) Clemon